

EXHIBIT A

Venezia, Stefania

From: Venezia, Stefania
Sent: Wednesday, May 23, 2018 5:54 PM
To: 'Weiss, Michael B.'; Andrus, Brent; Neuwirth, John; Amsel, Joshua; D'Aloia, Justin; Djilani, Jessica
Cc: Gilman, Charles A.; Saucier, Caroline; Richardson, Nathan; Andrus, Brent
Subject: RE: UMB v. Sanofi

Michael –

As we have informed you, we are considering whether there is a targeted production that Sanofi would be prepared to make on this topic. We will let you know as soon as we can, but your requests below are not targeted.

Best,

Stefania

Weil

Stefania D. Venezia
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From: Weiss, Michael B. <MWeiss@Cahill.com>
Sent: Tuesday, May 22, 2018 3:28 PM
To: Venezia, Stefania <Stefania.Venezia@weil.com>; Andrus, Brent <BAndrus@cahill.com>; Neuwirth, John <john.neuwirth@weil.com>; Amsel, Joshua <joshua.amsel@weil.com>; D'Aloia, Justin <Justin.DAloia@weil.com>; Djilani, Jessica <Jessica.Djilani@weil.com>
Cc: Gilman, Charles A. <cgilman@cahill.com>; Saucier, Caroline <CSaucier@cahill.com>; Richardson, Nathan <NRichardson@cahill.com>; Andrus, Brent <BAndrus@cahill.com>
Subject: RE: UMB v. Sanofi

Dear Stefania:

Mr. Andrus will address the issue of the number, timing and location of depositions.

However, as to the issue of the production of documents relating to the recent decision by Sanofi to initiate a clinical trial in Progressive Primary Multiple Sclerosis ("PPMS"). References to "Lemtrada" shall be references to Lemtrada® (alemtuzumab). Please let the Trustee know by the end of business on Weds whether the following documents will be produced immediately:

- Documents sufficient to show any material scientific, regulatory or commercial evaluations relevant to the decision to abandon GLD52 (GZ 402668) in favor of Lemtrada in PPMS.
- All material communications with the FDA regarding any study with GLD52 and/or Lemtrada in PPMS, including any study relating to a subcutaneous formulation of Lemtrada in a PPMS population.
- Documents sufficient to set out the regulatory path, clinical trial design, budgeting and expected timelines for any Phase III study in PPMS with Lemtrada.
- Documents sufficient to show the internal deliberative process resulting in the decision to abandon development of GLD52 in favor of Lemtrada in PPMS.
- Documents sufficient to show any material presentations relating to the foregoing to senior executives of Sanofi, the Board of Directors or any group or committee tasked with such review. Including, without limitation, Olivier Brandicourt, the PMC, the IDC, the ComEx and/or the DWG.
- The evaluative documents identified by Ms. Huntsman in her deposition relating to the foregoing, including any assessment of commercial value of Lemtrada in PPMS
- The Integrated Development Plan for Lemtrada in PPMS.
- The most recent draft or final version of any Brand Plan, LRP, Strategic Plan, budget or forecast document, MS Alignment document or equivalent document referencing Lemtrada in PPMS.
- Document sufficient to show of the role of any analysis of the gap in Aubagio revenue as a result of loss of exclusivity, the expiration of any royalty obligations on Lemtrada, the CVR Agreement or the Bayer Agreement, as a rationale for the initiation of a trial in PPMS with Lemtrada.

Best,

Michael

From: Venezia, Stefania [<mailto:Stefania.Venezia@weil.com>]

Sent: Tuesday, May 22, 2018 12:30 PM

To: Andrus, Brent; Neuwirth, John; Amsel, Joshua; D'Aloia, Justin; Djilani, Jessica
Cc: Gilman, Charles A.; Weiss, Michael B.; Saucier, Caroline
Subject: RE: UMB v. Sanofi

Brent:

Sanofi will not agree to the Trustee taking more than the agreed-upon 25 depositions. Accordingly, please let us know as soon as possible which of the individuals in your list below you wish to depose so that we can gather dates most efficiently. We have already started that process.

Please also confirm as soon as possible the following deposition dates that we have previously provided:

- Mark Underwood: June 13 or July 31 (BOSTON)
- Laurence Forest: July 10 (LONDON)
- Jerome Contamine: July 12 (PARIS)
- Jose Davila: August 2 (BOSTON)

We suggest that once we schedule the remaining depositions, we discuss an appropriately tailored extension of the deposition cut-off, as well as the other deadlines in the current scheduling order.

Finally, we are considering your request that we propose a targeted universe of documents relating to Sanofi's decision to develop or commercialize alemtuzumab in primary progressive multiple sclerosis ("PPMS") and will be back to you shortly.

Best,

Stefania

Weil

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From: Andrus, Brent <BAndrus@cahill.com>

Sent: Wednesday, May 16, 2018 7:06 PM

To: Neuwirth, John <john.neuwirth@weil.com>; Amsel, Joshua <joshua.amsel@weil.com>; Venezia, Stefania <Stefania.Venezia@weil.com>; D'Aloia, Justin <Justin.DAloia@weil.com>

Cc: Gilman, Charles A. <cgilman@cahill.com>; Weiss, Michael B. <MWeiss@Cahill.com>; Saucier, Caroline <CSaucier@cahill.com>

Subject: UMB v. Sanofi

Josh and Stefania,

As discussed on today's phone call, below are additional deposition witnesses that we would like to notice. As we requested, please respond as soon as possible with available dates for these witnesses to be deposed, keeping in mind

the June 29, 2018 date for end of fact discovery. If all the depositions cannot be completed by that date, we will need to adjust our August 10, 2018 date for expert reports. An open line of communication on depositions and scheduling would be greatly appreciated.

1. David Margolin
2. Scott Canute
3. Elias Zerhouni
4. David Meeker
5. Terry Murdoch
6. Antoine Schaeffer
7. Olivier Brandicourt
8. Martin Solberg
9. William Aitchison
10. Sandra Poole
11. Ron Branning
12. Robin Kenselaar

As we explained on today's call, this brings us over 25 noticed deponents. But as we discussed, we may not need to take testimony from all noticed witnesses and/or we are willing to limit depositions to a total hour amount.

We are working on a 30(b)(6) notice and will get it to you fairly soon. Please get back to us as soon as possible about the other proposals discussed on our call today.

Best,

Brent

Brent Andrus | Associate

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Michael B. Weiss | Partner

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